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|---|-----------------------------|--|------------------------|---|
| 2020 EPA CDR Primary Form U  Form U 2020 | | U.S. Environmental Protection Agency Washington, DC 20460 Chemical Data Reporting Site Report (Section 8(a) Toxic Substances Control Act, 15 U.S.C. 2607(a)) | | Included in this submission Original CDR 2020 Submission Amendment to an Original CDR 2020 Submission X |
| Submission Date: | 01/29/2021 | Revised Date: | 12/16/2021 | |
| Amendment Explanation | | | | |
| <p>On January 29, 2021, Moses Lake Industries, Inc. (MLI or the Company) timely submitted to the U.S. Environmental Protection Agency (EPA) its Form U under the 2020 TSCA Chemical Data Reporting (CDR) Rule report [Case Number CDR-2020-04998]. This Form U was submitted for the Company's Moses Lake, WA site. MLI is currently conducting a voluntary compliance audit under EPA's Policy on Incentives for Self-Policing (Audit Policy). Specifically, this ongoing audit is evaluating the Company's compliance with the Toxic Substances Control Act (TSCA) at its site including compliance with CDR. As part of this audit, MLI discovered certain errors in its 2020 CDR Form U report. As a result of this discovery, the Company promptly disclosed to EPA these potential violations of TSCA Section 8. The Audit Policy also requires that these CDR violations be corrected. To this end, MLI herein submits its amended 2020 CDR Form U to EPA correcting these errors.</p> | | | | |
| CDR Certification | | | | |
| <p>I certify, under penalty of law, that this document was prepared under my direction of supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.</p> | | | | |
| TSCA CBI Certification | | | | |
| <p>I certify that all claims for confidentiality asserted with this submission are true and correct, and all information submitted herein to substantiate such claims is true and correct. Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 U.S.C. 1001.</p> <p>I further certify that:</p> <ul style="list-style-type: none"> i. I have taken reasonable measures to protect the confidentiality of the information; ii. I have determined that the information is not required to be disclosed or otherwise made available to the public under any other Federal law; iii. I have a reasonable basis to conclude that disclosure of the information is likely to cause substantial harm to the competitive position of my company; and iv. I have a reasonable basis to believe that the information is not readily discoverable through reverse engineering. | | | | |
| Signature of Authorized Official | Patrick J Blau | Name (printed) | Patrick J Blau | |
| Date Signed | 12/16/2021 | Email Address | pblau@mlindustries.com | |
| Submitting Official Information | | | | |
| Name of Authorized Official | Patrick J Blau | | | CBI: |
| Company Name | MOSES LAKE INDUSTRIES, INC. | Position | EHSS Manager | |
| Email Address | pblau@mlindustries.com | Phone Number | 5097625336 | |
| Mailing Address 1 | 8248 RANDOLPH RD NE | | | |
| Mailing Address 2 | | | | |
| City | MOSES LAKE | State | WA | |
| Postal Code | 98837 | Country | US | |

Part I. COMPANY & SITE IDENTIFICATION INFORMATION**Section A.1 Domestic Parent Company Information**

| | | | |
|-------------------------|-----------------------------|---------------|-------------------------|
| Company Name | MOSES LAKE INDUSTRIES, INC. | Company Type | Domestic Parent Company |
| Dun & Bradstreet Number | 14-441-4026 | | |
| Mailing Address 1 | 8248 RANDOLPH RD NE | | |
| Mailing Address 2 | | City | MOSES LAKE |
| State | WA | County/Parish | Grant |
| Postal Code | 98837 | Country | US |

Section A.2 Foreign Company Information

| | | | |
|---|-----------------------|-----------------------|-----------------|
| Foreign Company Name | TAMA CHEMICALS CO LTD | Company Type | Foreign Company |
| Foreign Company Dun & Bradstreet Number | 12-345-6789 | | |
| Foreign Company Address | 6-1 Higashidacho | | |
| Foreign Company Address 2 | Kawasaki-Ku | Foreign City | Kawasaki City |
| Foreign State/Province/Other | Kanagawa Prefecture | Foreign County/Parish | |
| Foreign Postal Code | 210-0005 | Foreign Country | JA |

Section B. Site Information

| | | | |
|-----------------|---------------------------|-------------------------|-------------|
| EPA Registry ID | 110011580093 | Program ID | 100607170 |
| Site Name | MOSES LAKE INDUSTRIES INC | Dun & Bradstreet Number | 14-441-4026 |
| Site Address | 8248 RANDOLPH RD NE | | |
| Site Address 2 | | City | MOSES LAKE |
| State | WA | County/Parish | GRANT |
| Postal Code | 98837 | Country | US |

North American Industry Classification System (NAICS) Code(s)

| | |
|---|--------------------------------|
| NAICS Code | Activity Classification |
| 325180 Other Basic Inorganic Chemical Manufacturing | Both |

Part II. CHEMICAL SUBSTANCE INFORMATION**Section A. Chemical Substance Identification**

| | | | |
|-----------------------------------|---|---|-------------------|
| Chemical Name | Methanaminium, N,N,N-trimethyl-, carbonate (1:1) | Chemical Identifying Number | 58345-96-3 |
| Number ID Code | CASRN | Chemical Alias | |
| Company Information Confidential: | Site Information Confidential: | Technical Contact Information Confidential: | |

Section B. Technical Contact Information**CBI**

| | | | |
|-------------------|------------------------------|---------------|-------------------------------|
| Contact Name | Patrick Blau | Company Name | Moses Lake Industires |
| Phone Number | 5097625336 | Email Address | PBlau@mlindustries.com |
| Mailing Address 1 | 8248 Randolph Road NE | | |
| Mailing Address 2 | | | |
| City | Moses Lake | State | WA |
| Postal Code | 98837 | Country | US |

Section C. Manufacturing Information**Non-Principal Reporting Year(s) Production Volume Information****CBI**

| | | |
|--------------------|-----------------|--|
| Calendar Year 2018 | 23196236 | |
| Calendar Year 2017 | 23596892 | |
| Calendar Year 2016 | 20882150 | |

Section C.1 Manufacturing Company

| Report CY 2019 Production Volume and Related Information | | CBI | | CBI |
|---|-----------------------|------------|--|-------------------|
| Activity | Manufacture: X | | Activity | Import: |
| Domestically Manufactured | 23,958,795 | | Imported | 0 |
| Imported Chemical Never Physically at Site | | | Volume Used on Site | 15,271,565 |
| Volume Directly Exported | 5,318,445 | | % of Total Production Volume (by Weight) that is Manufactured as a Byproduct | B1 |
| Report Exposure Related Information | | CBI | | CBI |
| Number of Workers | W4 | | Max Concentration | M4 |
| Is the chemical being recycled? | No | | | |

Report Physical Form for 2019 Production Volume

| Form | CBI | % Production Volume | CBI |
|-------------|------------|----------------------------|------------|
| Liquid | | 100 | |

Section D. Processing and Use Information**Section D.1 Industrial Processing and Use****Total Substance Volume (Manufactured, Imported, Contracted)**

| Process and Use Information | | CBI | | CBI |
|------------------------------------|-------------|------------|---------------------|-------------|
| Type of Process or Use | PC | | Sector(s) | IS21 |
| Function Category | F037 | | % Production Volume | 65 |
| Number of Sites | S1 | | Number of Workers | W4 |

Section D.2 Consumer and Commercial Use**Total Substance Volume (Manufactured, Imported, Contracted)**

There are no applicable Consumer and Commercial Uses for this chemical.

Section E. Confidential Business Information Substantiation

There are no substantiations for this chemical.

Section A. Chemical Substance Identification

| | | | |
|-----------------------------------|--------------------------------|---|----------------|
| Chemical Name | Methanol | Chemical Identifying Number | 67-56-1 |
| Number ID Code | CASRN | Chemical Alias | |
| Company Information Confidential: | Site Information Confidential: | Technical Contact Information Confidential: | |

Section B. Technical Contact Information**CBI**

| | | | |
|-------------------|------------------------------|---------------|-------------------------------|
| Contact Name | Patrick Blau | Company Name | Moses Lake Industries |
| Phone Number | 5097625336 | Email Address | PBlau@mlindustries.com |
| Mailing Address 1 | 8248 Randolph Road NE | | |
| Mailing Address 2 | | | |
| City | Moses Lake | State | WA |
| Postal Code | 98837 | Country | US |

Section C. Manufacturing Information**Non-Principal Reporting Year(s) Production Volume Information****CBI**

| | | |
|--------------------|----------------|--|
| Calendar Year 2018 | 5511000 | |
| Calendar Year 2017 | 5530000 | |
| Calendar Year 2016 | 4640000 | |

Section C.1 Manufacturing Company**Report CY 2019 Production Volume and Related Information****CBI****CBI**

| | | | |
|--|-----------------------|--|------------------|
| Activity | Manufacture: X | Activity | Import: |
| Domestically Manufactured | 5,518,000 | Imported | 0 |
| Imported Chemical Never Physically at Site | | Volume Used on Site | 5,518,000 |
| Volume Directly Exported | 0 | % of Total Production Volume (by Weight) that is Manufactured as a Byproduct | B4 |

Report Exposure Related Information**CBI****CBI**

| | | | |
|---------------------------------|------------|-------------------|-----------|
| Number of Workers | W4 | Max Concentration | M5 |
| Is the chemical being recycled? | Yes | | |

Report Physical Form for 2019 Production Volume

| | | | |
|-------------|------------|----------------------------|------------|
| Form | CBI | % Production Volume | CBI |
| Liquid | | 100 | |

Section D. Processing and Use Information**Section D.1 Industrial Processing and Use****Total Substance Volume (Manufactured, Imported, Contracted)****Process and Use Information****CBI****CBI**

| | | | |
|------------------------|-------------|---------------------|-------------|
| Type of Process or Use | U | Sector(s) | IS21 |
| Function Category | F075 | % Production Volume | 100 |
| Number of Sites | S1 | Number of Workers | W4 |

Process and Use Information**CBI****CBI**

| | | | |
|------------------------|-------------|---------------------|-------------|
| Type of Process or Use | U | Sector(s) | IS21 |
| Function Category | F031 | % Production Volume | 100 |
| Number of Sites | S1 | Number of Workers | W4 |

Section D.2 Consumer and Commercial Use

Section D.2 Consumer and Commercial Use

Total Substance Volume (Manufactured, Imported, Contracted)

There are no applicable Consumer and Commercial Uses for this chemical.

Section E. Confidential Business Information Substantiation

There are no substantiations for this chemical.

Section A. Chemical Substance Identification

| | | | |
|-----------------------------------|---|---|----------------|
| Chemical Name | Methanaminium, N,N,N-trimethyl-, hydroxide (1:1) | Chemical Identifying Number | 75-59-2 |
| Number ID Code | CASRN | Chemical Alias | |
| Company Information Confidential: | Site Information Confidential: | Technical Contact Information Confidential: | |

Section B. Technical Contact Information**CBI**

| | | | |
|-------------------|------------------------------|---------------|-------------------------------|
| Contact Name | Patrick Blau | Company Name | Moses Lake Industires |
| Phone Number | 5097625336 | Email Address | PBlau@mlindustries.com |
| Mailing Address 1 | 8248 Randolph Road NE | | |
| Mailing Address 2 | | | |
| City | Moses Lake | State | WA |
| Postal Code | 98837 | Country | US |

Section C. Manufacturing Information**Non-Principal Reporting Year(s) Production Volume Information****CBI**

| | | |
|--------------------|-----------------|--|
| Calendar Year 2018 | 10023570 | |
| Calendar Year 2017 | 8078681 | |
| Calendar Year 2016 | 6536650 | |

Section C.1 Manufacturing Company**Report CY 2019 Production Volume and Related Information****CBI****CBI**

| | | | |
|--|-----------------------|--|----------------|
| Activity | Manufacture: X | Activity | Import: |
| Domestically Manufactured | 10,488,628 | Imported | 0 |
| Imported Chemical Never Physically at Site | | Volume Used on Site | 0 |
| Volume Directly Exported | 6,607,835 | % of Total Production Volume (by Weight) that is Manufactured as a Byproduct | B1 |

Report Exposure Related Information**CBI****CBI**

| | | | |
|---------------------------------|-----------|-------------------|-----------|
| Number of Workers | W4 | Max Concentration | M2 |
| Is the chemical being recycled? | No | | |

Report Physical Form for 2019 Production Volume

| | | | |
|-------------|------------|----------------------------|------------|
| Form | CBI | % Production Volume | CBI |
| Liquid | | 0 | |

Section D. Processing and Use Information**Section D.1 Industrial Processing and Use****Total Substance Volume (Manufactured, Imported, Contracted)****Process and Use Information****CBI****CBI**

| | | | |
|------------------------|-------------|---------------------|-------------|
| Type of Process or Use | U | Sector(s) | IS41 |
| Function Category | F073 | % Production Volume | 100 |
| Number of Sites | S1 | Number of Workers | W6 |

Section D.2 Consumer and Commercial Use**Total Substance Volume (Manufactured, Imported, Contracted)**

There are no applicable Consumer and Commercial Uses for this chemical.

Section E. Confidential Business Information Substantiation

There are no substantiations for this chemical.

Section A. Chemical Substance Identification

| | | | |
|-----------------------------------|--|---|------------------|
| Chemical Name | Sulfuric acid copper(2+) salt (1:1) | Chemical Identifying Number | 7758-98-7 |
| Number ID Code | CASRN | Chemical Alias | |
| Company Information Confidential: | Site Information Confidential: | Technical Contact Information Confidential: | |

Section B. Technical Contact Information**CBI**

| | | | |
|-------------------|------------------------------|---------------|-------------------------------|
| Contact Name | Patrick Blau | Company Name | Moses Lake Industries |
| Phone Number | 5097625336 | Email Address | PBlau@mlindustries.com |
| Mailing Address 1 | 8248 Randolph Road NE | | |
| Mailing Address 2 | | | |
| City | Moses Lake | State | WA |
| Postal Code | 98837 | Country | US |

Section C. Manufacturing Information**Non-Principal Reporting Year(s) Production Volume Information****CBI**

| | | |
|--------------------|----------------|--|
| Calendar Year 2018 | 1681645 | |
| Calendar Year 2017 | 2919706 | |
| Calendar Year 2016 | 1186219 | |

Section C.1 Manufacturing Company**Report CY 2019 Production Volume and Related Information****CBI****CBI**

| | | | |
|--|-----------------------|--|----------------|
| Activity | Manufacture: X | Activity | Import: |
| Domestically Manufactured | 2,177,964 | Imported | 0 |
| Imported Chemical Never Physically at Site | | Volume Used on Site | 0 |
| Volume Directly Exported | 1,088,982 | % of Total Production Volume (by Weight) that is Manufactured as a Byproduct | B2 |

Report Exposure Related Information**CBI****CBI**

| | | | |
|---------------------------------|-----------|-------------------|-----------|
| Number of Workers | W4 | Max Concentration | M2 |
| Is the chemical being recycled? | No | | |

Report Physical Form for 2019 Production Volume

| | | | |
|-------------|------------|----------------------------|------------|
| Form | CBI | % Production Volume | CBI |
| Liquid | | 100 | |

Section D. Processing and Use Information**Section D.1 Industrial Processing and Use****Total Substance Volume (Manufactured, Imported, Contracted)****Process and Use Information****CBI****CBI**

| | | | |
|------------------------|-------------|---------------------|-------------|
| Type of Process or Use | PA | Sector(s) | IS41 |
| Function Category | F053 | % Production Volume | 36 |
| Number of Sites | S1 | Number of Workers | W6 |

Process and Use Information**CBI****CBI**

| | | | |
|------------------------|-------------|---------------------|-------------|
| Type of Process or Use | PC | Sector(s) | IS19 |
| Function Category | F037 | % Production Volume | 14 |
| Number of Sites | S1 | Number of Workers | W3 |

Section D.2 Consumer and Commercial Use

Section D.2 Consumer and Commercial Use

Total Substance Volume (Manufactured, Imported, Contracted)

There are no applicable Consumer and Commercial Uses for this chemical.

Section E. Confidential Business Information Substantiation

There are no substantiations for this chemical.

Section A. Chemical Substance Identification

| | | | |
|-----------------------------------|--------------------------------------|---|-----------------|
| Chemical Name | Carbonic acid, dimethyl ester | Chemical Identifying Number | 616-38-6 |
| Number ID Code | CASRN | Chemical Alias | |
| Company Information Confidential: | Site Information Confidential: | Technical Contact Information Confidential: | |

Section B. Technical Contact Information**CBI**

| | | | |
|-------------------|------------------------------|---------------|-------------------------------|
| Contact Name | Patrick Blau | Company Name | Moses Lake Industries |
| Phone Number | 5097625336 | Email Address | PBlau@mlindustries.com |
| Mailing Address 1 | 8248 Randolph Road NE | | |
| Mailing Address 2 | | | |
| City | Moses Lake | State | WA |
| Postal Code | 98837 | Country | US |

Section C. Manufacturing Information**Non-Principal Reporting Year(s) Production Volume Information****CBI**

| | | |
|--------------------|-----------------|--|
| Calendar Year 2018 | 15482905 | |
| Calendar Year 2017 | 12567322 | |
| Calendar Year 2016 | 10782699 | |

Section C.1 Manufacturing Company**Report CY 2019 Production Volume and Related Information****CBI****CBI**

| | | | | | |
|--|---------------------|--|--|-------------------|--|
| Activity | Manufacture: | | Activity | Import: X | |
| Domestically Manufactured | 0 | | Imported | 16,388,996 | |
| Imported Chemical Never Physically at Site | No | | Volume Used on Site | 16,388,996 | |
| Volume Directly Exported | 0 | | % of Total Production Volume (by Weight) that is Manufactured as a Byproduct | B1 | |

Report Exposure Related Information**CBI****CBI**

| | | | | | |
|---------------------------------|-----------|--|-------------------|-----------|--|
| Number of Workers | W4 | | Max Concentration | M5 | |
| Is the chemical being recycled? | No | | | | |

Report Physical Form for 2019 Production Volume

| | | | |
|-------------|------------|----------------------------|------------|
| Form | CBI | % Production Volume | CBI |
| Liquid | | 100 | |

Section D. Processing and Use Information**Section D.1 Industrial Processing and Use****Total Substance Volume (Manufactured, Imported, Contracted)****Process and Use Information****CBI****CBI**

| | | | |
|------------------------|-------------|---------------------|-------------|
| Type of Process or Use | PC | Sector(s) | IS21 |
| Function Category | F037 | % Production Volume | 100 |
| Number of Sites | S1 | Number of Workers | W4 |

Section D.2 Consumer and Commercial Use**Total Substance Volume (Manufactured, Imported, Contracted)**

There are no applicable Consumer and Commercial Uses for this chemical.

Section E. Confidential Business Information Substantiation

There are no substantiations for this chemical.

Paperwork Reduction Act Notice

The annual public burden for this collection of information, which is approved under OMB Control Number 2070-0162, varies depending on the submitter's experience with CDR reporting, and is estimated to average 135.80 hours per year for the average multi-chemical submission of 7.5 chemicals per site with 22% of reports consisting of partial reports and 15% of sites as new reporters. A full report includes manufacturing, processing, and use information. A partial report includes manufacturing information and does not include processing and use information. This estimate includes time spent on rule familiarization (for new reporters), compliance determination, form completion, and recordkeeping. This estimate also includes combined effects of increases to certain reporting activities (incremental rule familiarization and compliance determination, data elements on Form U) as well as the elimination of reporting for newly exempted chemical reports and/or sites from the CDR Revisions Final Rule. Burden is defined in 5 CFR 1320.3(b). In addition, for Central Data Exchange (CDX) activities the average per-response burden is estimated at 0.53 hours per registration for those respondents not already registered in CDX. Burden is defined in 5 CFR 1320.3(b). According to the Paperwork Reduction Act, "burden" means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. For this collection it includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information; processing and maintaining information; and disclosing or providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number. The OMB control number for this collection appears above. In addition, the OMB control numbers for EPA's regulations, after initial display in the final rule, are listed in 40 CFR part 9. Exp. 6/30/2023.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden (including the use of automated collection techniques) to: Director, Collection Strategies Division, U.S. Environmental Protection Agency (Mail Code 2822), 1200 Pennsylvania Ave, N.W., Washington, D.C. 20460. Include the OMB control number in any correspondence, but do not submit the completed form to this address. The requested information should be submitted in accordance with the instructions accompanying the form, or as specified in the corresponding regulation.